

Anne Foster, OSB No. 993152
afoster@sfklegal.com
Samuel T. Smith, OSB No. 084772
ssmith@sfklegal.com
Jaimee King, OSB No. 146042
jking@sfklegal.com
Smith Foster King LLP
3330 NW Yeon Ave, Suite 240
Portland, OR 97210
(503) 567-7100
Attorneys for Plaintiff

HON. MARCO A. HERNANDEZ

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KRISTINA THOMSEN, as conservator for
MINOR T., a minor child,

Plaintiff,

v.

TOPGOLF USA HILLSBORO, LLC, a Delaware
limited liability company, and TOPGOLF
INTERNATIONAL, INC., a Delaware
corporation,

Defendants.

TOPGOLF USA HILLBORO, LLC, a Delaware
limited liability company, and TOPGOLF
INTERNATIONAL, INC., a Delaware
corporation,

Third-Party Plaintiffs,

v.

KRISTINA THOMSEN, an individual, and JIM
WATKINS, an individual, and, ARTHUR
HUNG, an individual,

Third-Party Defendants.

Case No. 3:23-cv-01028-HZ

PLAINTIFF'S UNOPPOSED MOTION
TO FILE AMENDED DAMAGES
STATEMENT DUE TO ERROR IN
SUMMARY

PAGE 1 – PLAINTIFF'S UNOPPOSED MOTION TO FILE AMENDED DAMAGES
STATEMENT DUE TO ERROR IN SUMMARY

Plaintiff has discovered a few errors in her originally filed Statement of Damages. Specifically, there were some errors in Exhibit A, the summary of past medical expenses. These errors resulted in an overstatement of the Minor T's past medical expenses by \$7,106.55. Plaintiff moves the Court for an order allowing her to file an Amended Damages Statement resolving these mistakes. Defendants and Third-Party Defendants do not oppose this motion.

DATED: April 3, 2025.

SMITH FOSTER KING LLP

/s/ Anne D. Foster

Anne D. Foster, OSB No. 993152

Email: afoster@sfklegal.com

Samuel T. Smith, OSB No. 084772

Email: ssmith@sfklegal.com

Jaimee R. King, OSB No. 146042

Email: jking@sfklegal.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing PLAINTIFF'S UNOPPOSED MOTION TO FILE AMENDED DAMAGES STATEMENT DUE TO ERROR IN SUMMARY was served on:

Heidi Mandt
William Kastner
805 SW Broadway Ste 2440
Portland, OR 97205

Attorneys for Defendants/Third-Party Plaintiffs
Topgolf Hillsboro LLC and Topgolf
International, Inc.

- ☐ By hand delivery
- ☐ By first-class mail*
- ☐ By overnight mail
- ☐ By facsimile transmission
- Fax #:
- ☒ By electronic means through the Court's Case Management / Electronic Case File system, which will send automatic notification of filing to each person listed above
- ☒ By email:
hmandt@williamskastner.com

Douglas D. Foley
Brad Lewis
Foley Sampson & Lewis, PLLC
13115 NE 4th Street, Suite 260
Vancouver, WA 98624

Attorneys for Third-Party Defendants Hung and
Watkins

- ☐ By hand delivery
- ☐ By first-class mail*
- ☐ By overnight mail
- ☐ By facsimile transmission
- Fax #:
- ☒ By electronic means through the Court's Case Management / Electronic Case File system, which will send automatic notification of filing to each person listed above
- ☒ By email:
brad.lewis@dougfoleylaw.com
doug.foley@dougfoleylaw.com

* With first-class postage prepaid and deposited in Portland, Oregon.

DATED: April 3, 2025.

SMITH FOSTER KING LLP

/s/ Anne D. Foster

Anne D. Foster, OSB No. 993152

Email: afoster@sfklegal.com

Samuel T. Smith, OSB No. 084772

Email: ssmith@sfklegal.com

Jaimee R. King, OSB No. 146042

Email: jking@sfklegal.com

Attorneys for Plaintiff

PAGE 1 – CERTIFICATE OF SERVICE

SMITH FOSTER KING
— LLP —

3330 NW Yeon Ave, Ste 240
Portland, OR 97210
503.567.7100
smithfosterking.com